

UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Albert William Bleau Jr.

Plaintiff

Vs.

Bridgewell, Inc. (Greater Lynn Mental Health
& Retardation Association), et al,

Defendants

2006 NOV 29 P 1:04

U.S. DISTRICT COURT
DISTRICT OF MASS.

Civil Action
No. 04 – 10469WGY

Motion To Sanction Defendant Bridgewell, Inc.

Pursuant to Rule 37.1, the Plaintiff respectfully requests that this honorable court sanction defendant Bridgewell, Inc. for refusing to comply with the original time lines in the discovery plan of January 6, 2006; for refusing to allow the plaintiff access to their premises to copy files pursuant to Rule 34 and for refusing to meet with the plaintiff to develop a new discovery plan pursuant to Rule 26.

The plaintiff requests sanctions to include what the court considers just including payment to the plaintiff for lost work and expense, summary judgment on all plaintiff's claims for ADA, Defamation and Breach of Contract and or restricted discovery and timelines applied to the defendant.

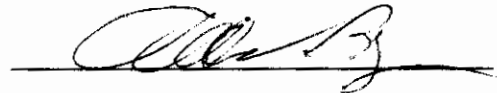
The plaintiff relies on the record and plaintiff's motion for reconsideration of November 30, 2006 with its accompanying attachments.

The plaintiff requests a hearing to present and discuss this motion.

For the fore mentioned facts and arguments the plaintiff respectfully requests that this motion be granted.

Dated: November 29, 2006

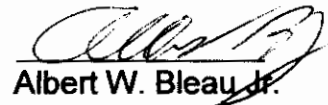
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all counsel of record by First Class Mail on November 30, 2006.



Albert W. Bleau Jr.

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